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July 27, 2017

BY ECF

Honorable Valerie E. Caproni United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. Percoco, et al., S1 16 Cr. 776 (VEC)</u>

Dear Judge Caproni:

We represent Joseph Percoco in the above-referenced matter. We write to respectfully request that Mr. Percoco's bail conditions be modified to permit him to travel to Massachusetts during the month of August 2017. Mr. Percoco is planning to visit Massachusetts on two occasions for college tours and other family obligations. He will keep Pretrial Services fully apprised of his travel plans.

We have spoken with Pretrial Services Officers Lisa Chan and AUSA Matthew Podolski. They have no objection to the requested relief.

Sincerely,

/s/ Andrew D. Gladstein

Andrew D. Gladstein

cc: AUSA Matthew Podolski (*via* electronic mail)
Pretrial Services Officers Lisa Chan and Joseph Perry (*via* electronic mail)